

Proposed Order

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:

)	Chapter 11
)	
ARENA FOOTBALL LEAGUE, LLC,)	Case No. 09-B-29024
)	
DEBTOR.)	Honorable Susan Pierson Sonderby
)	

**ORDER GRANTING MOTION OF CHAPTER 11 TRUSTEE TO SET BAR DATE
FOR “GAP CLAIMS” AND ADMINISTRATIVE CLAIMS,
EXCLUSIVE OF PROFESSIONAL FEES**

Upon the Motion (the “Motion”)¹ of Alex D. Moglia, not individually, but solely in his capacity as Chapter 11 trustee (the “Bankruptcy Trustee”) of the bankruptcy estate of Arena Football League, LLC (the “AFL”), for an order establishing bar date for “gap claims” and administrative claims and approving the form and the manner of notice thereof; and the Court having determined that the relief requested in the Motion is in the best interest of the Debtor, its respective estate, creditors and other parties-in-interest; and it appearing that proper and adequate notice has been given; and good cause having been shown for the relief herein granted; and it appearing that this matter is a core proceeding,

NOW THEREFORE, IT IS HEREBY ORDERED:

1. **February 12, 2010 is set as the bar date (“Bar Date”)** for the filing and assertion of (a) “gap claims” arising on or after August 7, 2009 and on or prior to August 25, 2009; and (b) administrative claims arising on or after August 26, 2009 through the date such claim is asserted.

2. For all such claims, a claim together with accompanying documentation, must be delivered to the Court in electronic or hard copy form so as to be received no later than 4:30 PM, Central Standard Time, on the Bar Date, at the following address:

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

The United States Bankruptcy Court
For the Northern District of Illinois
219 South Dearborn
Clerk's Office, Room 710
Chicago, IL 60604

With a copy to the following address:

Si-Yong Yi
Tressler LLP
233 S. Wacker Drive, 22nd Floor
Chicago, IL 60606

Facsimile submissions will not be accepted. Claims shall be deemed properly submitted by the Bar Date only when actually received in electronic or hard copy form no later than 4:30 PM, Central Standard Time, on the Bar Date.

3. Notwithstanding anything in this Order to the contrary, the Trustee shall retain the right to: dispute, defend, deny or assert a counterclaim or set-off against any claim.

4. The form of Bar Date Notice attached hereto as Exhibit 1 is approved, and shall be mailed or electronically transmitted to all known or reasonably ascertainable holders of "gap claims" and administrative claims as soon as practicable after the entry of this Order.

5. The form and the manner of notice of the Bar Date, in the manner set forth above, shall constitute adequate and sufficient notice of the Bar Date and shall be deemed to satisfy the requirements of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedures, and the Local Rules of this Court.

6. The Court retains jurisdiction to construe and enforce this order.

Dated: January ____, 2010

Enter: _____
Susan Pierson Sonderby
United States Bankruptcy Judge

#480098

Exhibit 1

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)
) Chapter 11
)
ARENA FOOTBALL LEAGUE, LLC,) Case No. 09-B-29024
)
) Honorable Susan Pierson Sonderby
DEBTOR.)

**NOTICE OF LAST DATE AND PROCEDURES
FOR SUBMISSION OF "GAP CLAIMS" OR ADMINISTRATIVE CLAIMS**

**TO ALL PERSONS OR ENTITIES ASSERTING "GAP CLAIMS" OR
ADMINISTRATIVE CLAIMS AGAINST THE ABOVE ENTITY:**

PLEASE TAKE NOTICE that on January 13, 2010, the United States Bankruptcy Court for the Northern District of Illinois (the "Court") entered an order fixing **February 12, 2010** as the deadline for filing and assertion of "gap claims" and of administrative claims. A claim means any right to payment or right to equitable performance, whether or not that claim has matured, liquidated or is contingent.

You have a "gap claim" if you have a claim against the above Debtor that arose on or after August 7, 2009 and on or prior to August 25, 2009.

You have an administrative claim if your claim against the above Debtor arose on or after August 26, 2009.

If you have either of these claims, you must file a claim by February 12, 2010.

1. **WHO MUST SUBMIT A CLAIM.** YOU MUST SUBMIT A CLAIM if you have a "gap claim" or an administrative claim as defined above.

2. **WHEN AND WHERE TO SUBMIT.** To be timely submitted, the "gap claim" or the administrative claim must be **RECEIVED in electronic or hard copy form no later than 4:30 p.m. (Central Standard Time) on February 12, 2010**, at the following address:

The United States Bankruptcy Court
for the Northern District of Illinois
Clerk's Office, Room 710
219 South Dearborn Street
Chicago, IL 60604

With a copy to the following address:

Si-Yong Yi
Tressler LLP
233 S. Wacker Drive, 22nd Floor
Chicago, IL 60606

Submissions by hand delivery or courier service must be delivered to the above-referenced address between the hours of 9:00 a.m. and 4:30 p.m. on regular business days.

SUBMISSIONS CANNOT BE MADE BY FACSIMILE TRANSMISSION OR TELECOPY.

Additional information may be obtained via the internet from the website for the U.S. Bankruptcy Court for the Northern District of Illinois at the following address:
<http://www.ilnb.uscourts.gov/>.

4. ANY PERSON OR ENTITY FAILING TO SUBMIT A CLAIM BY THE DEADLINE MAYBE FOREVER PREVENTED FROM ASSERTING OR COLLECTING ON THE CLAIM AGAINST ARENA FOOTBALL LEAGUE, LLC.

Chicago, Illinois

By Order of the Court

Dated: January ____, 2010

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